

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

**KERN COUNTY  
BAKERSFIELD METROPOLITAN SANITARY LANDFILL (AT BENA)**

**FINAL ENGINEERING EVALUATION**

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**Attachment A--Insignificant Activities**

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# **MSWL (EG) APPLICATION REVIEW**

Project #: 970762  
Deemed Complete: February 25, 1999

Engineer: Douglas Shaffer  
Date: December 6, 2002

Facility Number: S-3232  
Facility Name: County of Kern  
Bakersfield Metropolitan Sanitary Landfill  
Mailing Address: 2700 "M" Street, Suite 500  
Bakersfield, CA 93301

Contact Name: Tim Reed  
Phone: (661) 862 8855

Responsible Official: Daphne Washington  
Title: Director, Waste Management

## **I. PROPOSAL**

The County of Kern is proposing that a District permit be issued for its Bakersfield Metropolitan Sanitary Landfill (at Bena) facility in the County of Kern. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

## **II. FACILITY LOCATION**

Bakersfield Metropolitan Sanitary Landfill (at Bena) is located at 2951 Neumarkel Road, Edison, CA (Sections 3, 4, 9, 10, 33, 34 Townships 29S-30S Range 30E).

## **III. EQUIPMENT LISTING**

A detailed facility printout is not available for this previously un-permitted source. The facility consists of one municipal solid waste landfill with a 5.6 million cubic meter capacity.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment A. This equipment is not exempt from facility-wide requirements.

#### **IV. GENERAL PERMIT TEMPLATE USAGE**

The applicant is requesting to use the following model general permit Templates:

##### **A. SJV-UL-0-0 Landfill Facility-Wide Umbrella**

The applicant has requested to utilize template SJV-UL-0-0 for this facility. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

#### **V. SCOPE OF EPA AND PUBLIC REVIEW**

Certain segments of the proposed Operating Permit are based on general permit templates that have been previously subject to EPA and public review. The terms and conditions from the general permit templates are included in the proposed permit and are not subject to further EPA or public review.

For permit applications utilizing general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for general permit template, applicable requirements not covered by the general permit template, and the applicable procedural requirements for issuance of Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from general permit templates and are not subject to further EPA and Public review:

Conditions 1 through 30 and 37 through 42 of the facility wide requirements (S-3232-0)

#### **VI. APPLICABLE REQUIREMENTS ADDRESSED BY PERMIT TEMPLATES**

District Rule 1100 Equipment Breakdown (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 111)<sup>1</sup>

District Rule 1160 Emission Statements (Adopted November 18, 1992)<sup>1</sup>

District Rule 2010 Permits Required (Amended December 17, 1992)<sup>1</sup> (Non SIP replacement for Kern County Rule 201)

District Rule 2020 Exemptions (Amended July 21, 1994)<sup>1</sup> (Non SIP replacement for Kern County Rule 202)

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<sup>1</sup> The Umbrella Permit Template addressed these requirements for all permit units at this facility.

District Rule 2031 Transfer of Permits (Amended December 17, 1992) <sup>1</sup> (Non SIP replacement for Kern County Rule 203)

District Rule 2040 Applications (Amended December 17, 1992) <sup>1</sup> (Non SIP replacement for Kern County Rule 204)

District Rule 2070 Standards for Granting Applications (Amended December 17, 1992) <sup>1</sup> (Non SIP replacement for Kern County Rule 208)

District Rule 2080 Conditional Approval (Amended December 17, 1992) <sup>1</sup> (Non SIP replacement for Kern County Rule 209)

District Rule 2520 Federally Mandated Operating Permits (Adopted June 15, 1995)<sup>2</sup>, Sections 9.5.1, 9.5.2, 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, and 10.0

District Rule 4101 Visible Emissions (Amended December 17, 1992) <sup>1</sup> (Non SIP replacement for Kern County Rule 401)

District Rule 4601 Architectural Coatings (Amended December 17, 1992) <sup>1</sup>

40 CFR Part 61 Subpart M National Emission Standard for Asbestos <sup>3</sup>

40 CFR Part 82 Subpart F Stratospheric Ozone <sup>3</sup>

## **VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY PERMIT TEMPLATES**

District Rule 2520 Federally Mandated Operating Permits (Adopted June 15, 1995)

District Rule 8031 Bulk Materials (Adopted November 15, 2001)

District Rule 8041 Carryout and Trackout (Adopted November 15, 2001)

District Rule 8051 Open Areas (Adopted November 15, 2001)

District Rule 8061 Paved and Unpaved Roads (Adopted November 15, 2001)

District Rule 8071 Unpaved Vehicle/Equipment Traffic Areas (Adopted November 15, 2001)

40 CFR Part 60, Subpart WWW Standards of Performance for Municipal Solid Waste Landfills

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<sup>2</sup> District Rule 2520 is not currently applicable to landfills qualifying to use these templates, but will become applicable upon approval of the State Plan to implement the Emission Guidelines. Upon approval of the State Plan, the District permit of sources subject to the Emission Guidelines will be administratively converted to a Title V Operating Permit. Any source choosing to use these templates has accepted this enhanced administrative permit process.

## VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Federally Enforceable requirements. The terms and conditions that are part of the facility's Federally Enforceable requirements will be, upon approval into the state plan and administrative conversion, designated as "Federally Enforceable Through Title V Permit."

This facility is subject to the following rules that are not currently federally enforceable:

District Rule 4102 Nuisance

California Health and Safety Code, Section 42301.6(f)

For this facility the following conditions are based on the rules listed above and are not Federally Enforceable through Title V: condition 43 of the facility-wide requirements (N-3696-0).

## IX. COMPLIANCE

### A. Requirements Addressed by General Permit Templates

#### 1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UL-0-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements, S-3232-0, as condition numbers 1 through 30 and 37 through 42 to assure compliance with these requirements.

Due to the general nature of templates, general permit template conditions 31 through 35 have been revised in the template requirements for these permit units. These requirements address District Regulation VIII requirements and have been updated to address the revised rules, see [IX.B.2](#), below for compliance discussion.

### B. Requirements Not Addressed by General Permit Templates

#### 1. District Rule 2520 Federally Mandated Operating Permits (Adopted June 15, 1995)

Section 5.2 requires that permittees submit applications for Title V permit renewal at least six months prior to permit expiration.

Section 9.1 of the rule requires operational requirements and limitations to assure compliance with all applicable requirements.

Section 9.4.2 of the rule requires that periodic monitoring be performed if none is associated with a given emission limit to assure compliance.

Section 9.5.1 contains requirements to incorporate all applicable record keeping requirements into the Title V permit, and specific records of any required monitoring.

Section 9.5.2 of the rule requires that records of all required monitoring data and support information be retained for a period of at least five years from the date of the monitoring sample, measurement, or report.

Section 9.6 contains requirements for the submittal of reports of monitoring at least every six months and prompt reporting of deviations from permitting requirements, including those attributable to upset conditions. All required reports must be certified by the responsible official.

Section 9.8 states that the Title V permit must also contain a severability clause in case of a court challenge.

Section 9.9 contains requirements for provisions in the Title V permit stating that 1) the permittee must comply with all permit conditions; 2) that the permitted activity would have to be reduced to comply with the permit conditions should not be a defense in an enforcement action, 3) that the permit may be revoked, modified, reissued, or reopened for cause, 4) that the Title V permit does not reflect any property rights, and 5) that the permittee will furnish the District with any requested information to determine compliance with the conditions of the Title V permit.

Section 9.10 contains the requirement to provide in the permit that the permittee pay annual permit fees and applicable fees from District Rules 3010, 3030, 3050, 3080, 3090, 3110, and 3120.

Section 9.14.1 requires any report or document submitted under a permit requirement or a request for information by the District or EPA shall contain a certification by a responsible official to truth, accuracy, and completeness.

Section 9.14.2 contains inspection and entry requirements that allow an authorized representative of the District to enter a permittee's premises to inspect equipment, operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements.

Section 9.17 requires that the permittee submit certification of compliance with the terms and standards of Title V permits to the EPA and the District annually (or more frequently as required by the applicable requirement or the District).

Section 10.0 requires any application form, report or compliance certification submitted pursuant to these regulations shall contain certification of truth accuracy, and completeness by a responsible official.

a. Municipal Solid Waste Landfill (S-3232-1)

Permit condition 13 will assure that all records be maintained for at least five years.

2. SJVUAPCD Regulation VIII (District Rules 8021, 8031, 8041, 8051, 8061 and 8071) - Fugitive Dust (PM<sub>10</sub>)

The purpose of Regulation VIII (Fugitive PM<sub>10</sub> Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM<sub>10</sub>) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The Rules contained in this Regulation have been developed pursuant to United States Environmental Protection Agency guidance for Serious PM<sub>10</sub> Nonattainment Areas. The rules are applicable to specified anthropogenic fugitive dust sources. Fugitive dust contains PM<sub>10</sub> and particles larger than PM<sub>10</sub>. Controlling fugitive dust emissions when visible emissions are detected will not prevent all PM<sub>10</sub> emissions, but will substantially reduce PM<sub>10</sub> emissions.

The provisions of this Regulation are applicable to specified outdoor fugitive dust sources. The definitions, exemptions, requirements, administrative requirements, record keeping requirements, and test methods set forth in Rule 8011 are applicable to all Rules under Regulation VIII (Fugitive PM<sub>10</sub> Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. The provisions of this Regulation shall be effective on and after May 15, 2002.

RULE 8021:

The purpose of this rule is to limit fugitive dust emissions from construction, demolition, excavation, extraction, and other earthmoving activities. This rule applies to any construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site. This rule also applies to the construction of new landfill disposal sites or modification to existing landfill disposal sites prior to commencement of landfilling activities. This rule requires the use of control measures to maintain visible dust emissions (VDE) under the 20% opacity requirement.

**RULE 8031:**

The purpose of this rule is to limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials. This rule applies to the outdoor handling, storage, and transport of any bulk material.

**RULE 8041:**

The purpose of this rule is to limit fugitive dust emissions from carryout and trackout. This rule applies to all sites that are subject to Rules 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), 8031 (Bulk Materials), and 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or trackout has occurred or may occur.

**RULE 8051:**

The purpose of this rule is to limit fugitive dust emissions from open areas. This rule applies to any open area having 3.0 acres or more of disturbed surface area that has remained undeveloped, unoccupied, unused, or vacant for more than seven days.

**RULE 8061:**

The purpose of this rule is to limit fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria. This rule applies to any new or existing public or private paved or unpaved road, road construction project, or road modification project.

**RULE 8071:**

The purpose of this rule is to limit fugitive dust emissions from unpaved vehicle and equipment traffic areas. This rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger.

**a. Facility Wide Requirements (N-3696-0)**

Compliance with these regulations is assured by conditions 31 through 36.

**3. 40 CFR Part 60, Subpart WWW Standards of Performance for Municipal Solid Waste Landfills**

Section 60.752(a) and (b) contain requirements for submittal of initial and subsequent design capacity and NMOC emission reports. Conditions addressing submittal of the initial design capacity and initial NMOC emission rate reports to the APCO are not included in the requirements of permit units. These requirements are extraneous, since landfills are required to submit these reports to the APCO, with their permit application for the landfill. The submittal of amended design capacity reports is not required for this source since they have a design capacity above the 2.5 million megagrams and 2.5 million cubic meters limits prior to any modification.



Section 60.753 establishes the operational standards for landfill gas collection and control systems.

Section 60.754 specifies test methods and procedures.

Section 60.755 specifies compliance provisions.

Section 60.757(a) addresses initial and subsequent design capacity report submittal. Subsections (b), (c) and (d) address reporting requirements for NMOC emission rates and landfill closure reports. Subsections (e), (f) and (g) address reporting requirements for controlled landfills.

Section 60.758 specifies record keeping requirements.

Section 60.759 contains specifications for MSWL gas active collection systems.

a. Municipal Solid Waste Landfill (S-3232-1)

- Permit conditions 1 through 7 address the requirements of Section 60.754.
- Permit conditions 7 and 14 through 17 address the requirements of Section 60.752.
- Permit conditions 7 through 12, 15 and 17 address the requirements of Section 60.757.
- Permit conditions 13 and 17 address the requirements of Section 60.758.
- Permit conditions 16 and 17 address the requirements of Sections 60.753, 60.755 and 60.756.
- Permit condition 17 addresses the requirements of Section 60.759.

## **X. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

Requirements Addressed by Model General Permit Templates:

By using the model general permit template(s) listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template(s). The basis for each permit shield is discussed in the Permit Shield section of each template.

## **XI. PERMIT CONDITIONS**

See permit conditions on the following pages.

## **Attachment A**

### **Insignificant Activities**

## Title V Application - INSIGNIFICANT ACTIVITIES

COMPANY NAME:    Bakersfield Metropolitan Landfill @ Bena			FACILITY ID:    S-3232		
Check the box next to the exemption category from Rule 2020 which describes any insignificant activity or equipment at your facility not requiring a permit.					
Exemption Category	Rule 2020 Citation	√	Exemption Category	Rule 2020 Citation	√
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1		Containers used to store refined lubricating oils	6.6.8	√
Locomotives, airplanes, and watercraft used to transport passengers or freight	4.4		Unvented pressure vessels used exclusively to store liquified gases or assoc with exempt equipment	6.6.9 or 6.13	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1		Portable tanks used exclusively to store produced fluids for ≤ six months	6.6.10	
Piston-type i.c. engine with maximum continuous rating of 50 braking horsepower (bhp) or less	6.1.2	√	Mobile transport tanks on delivery vehicles of VOCs	6.6.11	√
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less	6.1.3		Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251	6.7.1.1	
Space heating equipment other than boilers	6.1.4	√	Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762	6.7.1.2	
Cooling towers with a circulation rate less than 10,000 gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers++	6.2		Equipment used exclusively for the transfer of refined lubricating oil	6.7.2	√
Use of less than 2 gal/day of graphic arts materials	6.3		Equipment used to apply architectural coatings	6.8.1	√
Equipment at retail establishments used to prepare food for human consumption	6.4.1		Unheated, non-conveyorized cleaning equipment with < 10 ft² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr. evaporative losses	6.9	√
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.1.1	6.4.3		Brazing, soldering, or welding equipment	6.10	√
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5		Equipment used to compress natural gas	6.11	√
Containers used to store clean produced water	6.6.1	√	Fugitive emissions sources assoc. with exempt equipment	6.12	√
Containers ≤ 100 bbl used to store oil with specific gravity ≥ 0.8762	6.6.2	√	Pits and Ponds as defined in Rule 1020	6.15	√
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762	6.6.3		On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature < 150 F	6.6.4	√	Emissions less than 2 lb/day from units not included above	6.19	√
Containers used to store unheated organic material with an initial boiling point ≥ 302 F*	6.6.5	√	Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance	7.2	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥ 0.9042	6.6.6		Non-structural repairs & maintenance to permitted equipment	7.3	√
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251	6.6.7	√	Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	

☐ No insignificant activities (Check this box if no equipment in the above categories exist at your facility.)

## **Attachment B**

### **EPA COMMENT / DISTRICT RESPONSE**

## EPA Comments / District Response

No comments were received from the EPA.

## **Attachment C**

### **PUBLIC COMMENT / DISTRICT RESPONSE**

## Public Comments / District Response

Public comments were received from Kern County Waste Management Department (KCWMD) regarding the proposed Title V Operating Permit for their municipal solid waste landfill facility in Kern County (District facility #S-3232). These comments are encapsulated below followed by the District's response. A copy of Kern County Waste Management Department's 10/28/2002 comment letter is available at the District.

### Comments on Facility Wide Permit Conditions:

#### 1. *KCWMD Comment*

**Conditions 1 and 2.** It is KCWMD's understanding that an equipment failure that resulted in the shut down of the system does not meet the intent of a "breakdown condition" since the amount of emissions generated would not increase, and may, under some circumstances, reduce the amount of emissions produced. Therefore, KCWMD requests that the District confirm that a breakdown condition does not exist unless actual excess emissions have occurred due to equipment breakdown.

#### District Response

A breakdown condition, as defined in District Rule 1100, Equipment Breakdown, Section 3.1 (Amended December 17, 1992), exists if any part of a permit unit is not operating as it is expected to by the permit conditions, regardless increase or decrease in actual emissions.

#### 2. *KCWMD Comment*

**Condition 10.** This condition indicates that reports of any required monitoring shall be submitted, however, it does not specify the reporting schedule or the form in which the report should be submitted. The condition should be revised to specify the reporting schedule.

#### District Response

Unless otherwise specified by specific permit requirements or arranged with the Compliance Division, the District bases report dates upon the anniversary date of initial issuance of the permit, refer to condition [44 of the facility wide permit](#). Each permit condition includes rule reference to assist facilities in determining the reporting requirements of each permit unit. The District has forms for reporting (TV-006 and TV-007) which are available at the nearest District office or at the District's website ([www.valleyair.org](http://www.valleyair.org)). The District may consider other reporting formats on a case-by-case basis. This condition will not be modified.

### **3. KCWMD Comment**

**Condition 22.** This condition states the provisions of District Rule 4101 (Visible Emissions) apply to landfills. The opacity limit of 20% is contradictory to the 40% opacity limit of Regulation VIII [Fugitive PM<sub>10</sub> Prohibitions]. KCWMD understands that District Rule 4101 applies specifically to non-fugitive, point sources, of emissions, and that the rules in Regulation VIII apply to fugitive dust sources. KCWMD believes that condition 22 should be revised so that it clearly states that it is applicable to point sources of particulate matter.

#### **District Response**

The language of condition 22 will change from:

“No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour...”

to read:

“No air contaminants shall be discharged into the atmosphere **from any source operation (as defined in District Rule 1020)** for a period or periods aggregating more than 3 minutes in any one hour...”

### **4. KCWMD Comment**

**Condition 37.** This facility doesn't meet the definition of an owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141. Furthermore, the inspection, notification, removal, and disposal procedures for asbestos-containing materials specified in 40 CFR 61.145 do not apply to this facility. Therefore, this condition should be removed.

#### **District Response**

There are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants that apply to all sources in general. These requirements pertain to asbestos removal and disposal from renovated or demolished structures. Compliance for these requirements is addressed in condition 37.

### **Comments on Landfill Permit Conditions:**

### **5. KCWMD Comment**

**Condition 1.** KCWMD proposes that condition 1 be revised to discard the detailed description and replace it with a simple reference to 40 CFR 60.754 (a)(3), and revise the condition language to state: “Tier 2 specifications to determine the site specific NMOC concentration shall be conducted in accordance with 40 CFR 60.754 (a)(3) and/or any other methodology approved by the District or the EPA.”



**District Response**

The condition reflects the language of NSPS; therefore, the District will not revise condition 1.

**6. KCWMD Comment**

**Conditions 2, 3, 4, 5, 7, 8, 11, 12 and 16.** These conditions each incorrectly identify the NMOC trigger level as 44 tons per year, rather than 50 Megagrams per year.

**District Response**

The permit conditions have been revised to reflect the current NSPS requirement of 50 Megagrams per year.

**7. KCWMD Comment**

**Conditions 11 and 12.** These conditions specify deadlines for report submission. While they are consistent with Federal requirements, they do not reflect the EPA's acceptance of "late" reports. KCWMD proposes that these conditions be revised to allow alternative deadlines for report submittal.

**District Response**

The District cannot propose less stringent requirements on a permit than the EPA requirements. The conditions will not be changed.

**Insignificant Activities:****8. KCWMD Comment**

KCWMD would like to add the following insignificant activities to those previously marked on TVFORM-003: containers used to store clean produced water (Rule 2020, 6.6.1), equipment used to compress natural gas (Rule 2020, 6.11), fugitive emissions associated with exempt equipment (Rule 2020, 6.12), mobile transport tanks on delivery vehicles of VOCs (Rule 2020, 6.6.11), equipment used to apply architectural coatings (Rule 2020, 6.8.1), equipment used exclusively for the transfer of refined lubricating oil (Rule 2020, 6.7.2), and pits and ponds as defined in Rule 1020 (Rule 2020, 6.15).

**District Response**

The District will update TVFORM-003 per your request.

Engineer Name	Douglas Shaffer
Engineer Initials	<Engineer's Initials>
Review Manager	Richard McVaigh
Facility's Regional Manager	Thomas Goff
Facility Name	Kern County--Bakersfield Metropolitan Sanitary Landfill (at Bena)
Facility #	S-3232
Project #	S-970762
Operation Description	municipal solid waste landfill
Location	at 2951 Neumarkel Road, Edison
	The following should make sense:  This is for its municipal solid waste landfill at 2951 Neumarkel Road, Edison, California.
Contact Receiving Final	Mr. Tim Reed
Mailing Address	2700 "M" Street, Suite 500 Bakersfield, CA 93301
Newspaper	Bakersfield Californian
Did EPA have objections?	No
Were there any comments?	Yes
Preliminary Notice Date	October 1, 2002

Gerardo C. Rios, Chief  
Permits Office (AIR-3)  
U.S. EPA - Region IX  
75 Hawthorne St.  
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit  
District Facility # S-3232  
Project # S-970762**

Dear Mr. Rios:

The District has issued the Final Title V Permit for Kern County--Bakersfield Metropolitan Sanitary Landfill (at Bena). The preliminary decision for this project was made on October 1, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Seyed Sadredin  
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

Mike Tollstrup, Chief  
Project Assessment Branch  
Air Resources Board  
P O Box 2815  
Sacramento, CA 95812-2815

**Re: Notice of Final Action - Title V Permit  
District Facility # S-3232  
Project # S-970762**

Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for Kern County--Bakersfield Metropolitan Sanitary Landfill (at Bena). The preliminary decision for this project was made on October 1, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

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I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Sayed Sadredin  
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

Tim Reed  
Kern County--Bakersfield Metropolitan Sanitary Landfill (at Bena)  
2700 "M" Street, Suite 500  
Bakersfield, CA 93301

**Re: Notice of Final Action - Title V Permit  
District Facility # S-3232  
Project # S-970762**

Dear Mr. Reed:

The District has issued the Final Title V Permit for Kern County--Bakersfield Metropolitan Sanitary Landfill (at Bena). The preliminary decision for this project was made on October 1, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

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Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Seyed Sadredin  
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT  
NOTICE OF FINAL DECISION TO ISSUE  
FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the initial Federally Mandated Operating Permit to Kern County--Bakersfield Metropolitan Sanitary Landfill (at Bena) for its municipal solid waste landfill at 2951 Neumarkel Road, Edison, California.

The District's analysis of the legal and factual basis for this proposed action, project #S-970762, is available for public inspection at the District office at the address below. For additional information regarding this matter, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900, or contact Seyed Sadredin, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

# TITLE V PUBLIC NOTICE CHECKLIST

FACILITY ID: S-3232 PROJECT #: S-970762

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REQST.   COMPL.

- \_\_\_ Title V PRELIMINARY PUBLIC NOTICE
- \_\_\_ Title V REVISED PROPOSED PUBLIC NOTICE
- √ \_\_\_ Title V FINAL PUBLIC NOTICE
- \_\_\_ Title V MODIFICATION PUBLIC NOTICE

## ENCLOSED DOCUMENTS REQUIRE:

- √ ☒ Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)
- √ \_\_\_ Stamp current date on all letters and signature page of the evaluation.
- √ \_\_\_ Send **FINAL** notice letters to CARB, EPA and applicant including the following attachments:
  - √ Engineering evaluation with attachments.
  - √ Public notice
- √ \_\_\_ Send **FINAL** public notice for publication to: Bakersfield Californian.
- √ \_\_\_ Send signed copies of all **FINAL** notice letters, engineering evaluation with attachments, and public notice to the following:
  - √ Douglas Shaffer, Permit Services Engineer
  - √ Thomas Goff, Permit Services Manager
- √ \_\_\_ Enter "Mail Date" onto project record.
- √ \_\_\_ Attach Compliance Assistance Bulletin "Title V Reporting Requirements" to the facility mailing.
- √ \_\_\_ Email Chay Thao Engineering Evaluation.
- √ \_\_\_ Engineer to Email regional PS manager; subject: "Initial Title V permits issued, please post all prorates for S-3232."
- \_\_\_ \_\_\_ Other special instructions: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date completed: January 13, 2003 By: Douglas Shaffer

San Joaquin Valley Air Pollution Control District

Final Engineering Evaluation

Facility # S-3232

Kern County--Bakersfield Metropolitan Sanitary Landfill (at Bena)

PREPARED BY:

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Douglas Shaffer  
Air Quality Engineer

REVIEWED BY:

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Richard McVaigh  
Permit Services Manager

APPROVED BY:

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Seyed Sadredin  
Director of Permit Services

FINAL DECISION DATE:

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## Title V Facility Contacts

Created On (Date): 13 September 2002

For (Facility name): Kern County-- Bakersfield Metropolitan Sanitary Landfill  
(at Bena)

(DBA ID Number): S-3232

By (District Staff Person): Douglas Shaffer

Based on Information Provided by: Initial Application Data

### Responsible Official

Name: Daphne Washington

Title: Director, Waste Management

Telephone: (661) 862-8900

Address: Kern County Waste Management Department  
2700 "M" Street, Suite 500  
Bakersfield, CA 93301

### Contacts for Questions Regarding Application

Name: Tim Reed

Title: Engineer

Telephone: (661) 862 8855

FAX: (661) 862 8901

### Send Draft Permits to:

Name: Tim Reed

Title: Engineer

Telephone: (661) 862 8855

FAX: (661) 862 8901

Address: Kern County Waste Management Department  
2700 "M" Street, Suite 500  
Bakersfield, CA 93301

### Send Proposed and Final Permits to:

Name: Daphne Washington

Title: Director, Waste Management

Telephone: (661) 862-8900

FAX: \_\_\_\_\_

Address: Kern County Waste Management Department  
2700 "M" Street, Suite 500  
Bakersfield, CA 93301